

EXHIBIT B

From: [Francisco E. Colon](#)
To: [Francisco Lopez-Romo](#)
Cc: [Karchmer, Margaret](#)
Subject: Re: Alan Goldman v McConnell Valdes, LLC, et al / 24cv01136 / First Set of Interrogatories and Production of Documents - Endurance and Sampo
Date: Tuesday, March 18, 2025 12:34:03 PM
Attachments: [image001.png](#)

External Email

So I was mistaken on both of my assumptions. I'll proceed as necessary.
Sent from my iPhone

On Mar 18, 2025, at 11:19 AM, Francisco Lopez-Romo
<lopezromo@gmail.com> wrote:

Francisco, do you acknowledge that I have the right to reconsider my decisions?

Sent from my iPhone

On Mar 18, 2025, at 8:59 AM, Francisco E. Colon
<FECOLON@colonramirez.com> wrote:

Pancho, following up. I am going to assume, first, that you are a man of your word, and second, that when you served the discovery you forgot you had mentioned at the hearing that you were not going to serve discovery on the carriers. Unless you tell me I am mistaken on both counts, I will consider your discovery on Sampo and Endurance withdrawn.

<[image001.png](#)>

From: Francisco E. Colon
Sent: Wednesday, March 12, 2025 5:26 PM
To: Francisco M. Lopez-Romo <lopezromo@gmail.com>;
mkarchmer@wiley.law
Cc: Irmarilis Torres-Falcon <irmarilis1869@gmail.com>
Subject: RE: Alan Goldman v McConnell Valdes, LLC, et al / 24cv01136 /
First Set of Interrogatories and Production of Documents - Endurance and
Sampo

Pancho, at the last hearing you confirmed to the Court that you were

not going to serve written discovery on the carriers. I therefore ask that you withdraw the discovery served on Sompó and Endurance.

Sincerely,

<image001.png>

From: Francisco M. Lopez-Romo <lopezromo@gmail.com>

Sent: Wednesday, March 12, 2025 3:36 PM

To: Francisco E. Colon <fecolon@colonramirez.com>;
mkarchmer@wiley.law

Cc: Francisco Lopez-Romo <lopezromo@gmail.com>; Irmarilis Torres-Falcon <irmarilis1869@gmail.com>

Subject: Alan Goldman v McConnell Valdes, LLC, et al / 24cv01136 / First Set of Interrogatories and Production of Documents - Endurance and Sompó

Good Afternoon:

Please disregard the version sent today at 10:34a.m. I reported that it was a second set of interrogatories when it should have said the first set of interrogatories and request for production of documents.

Please use this version of the First Set of Interrogatories and Request for Production of Documents.

Thanks.

s/Irmarilis Torres Falcon
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